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From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering
Command
To: Distribution
Subj: MONTHLY PROGRESS REPORT FOR OCTOBER 1996 ENGINEERING FIELD
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS
POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Encl: (1) October 1996 Monthly Progress Report (MPR)

1. Enclosure (1) is forwarded for your information.
2. If you have any questions, please contact the undersigned at (415) 244-2571.

Original signed by:

RICHARD E. POWELL
By direction of
the Commanding Officer

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RAB Member: Mayor's Hunters Point Shipyard Citizens Advisory Committee
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**INSTALLATION RESTORATION PROGRAM
MONTHLY PROGRESS REPORT**

OCTOBER 1996

**NAVAL FACILITIES ENGINEERING COMMAND
HUNTERS POINT SHIPYARD**

1. PROGRESS DURING THE REPORT PERIOD

The activities described below were completed during the current report period. Those activities described as complete in the previous monthly progress report have been omitted for brevity. The facility status is as follows:

Field Work:

Remedial investigation fieldwork has been completed for Parcels B, C, and D. Field activities conducted for Parcel E are described below.

The third round of groundwater samples is expected to be collected on schedule at the new monitoring wells in November 1996.

The soil gas survey at Area of Concern (AOC)-74 (previously SI-74) previously scheduled to be completed by mid-October 1996 was delayed due to the preparation of contractual documents and is rescheduled to begin November 14, 1996. The actual survey is expected to be completed in one to two days.

Analysis of soil samples collected in IR-02 and IR-15 indicated dioxins and furans at low levels at the surface, none were detected at depth. Several additional soil samples were collected at three locations to help define the extent of contamination. Preliminary evaluation of the data indicates mostly localized contamination. Several additional samples will be collected in November at one of the three sites to complete the definition of the extent of contamination.

In Parcel E, four new groundwater monitoring wells have been installed off-facility, adjacent to the western boundary of IR-01. The monitoring wells are expected to help define the direction of groundwater flow in the A aquifer at the Hunters Point Shipyard (HPS) boundary. The third round of groundwater samples are scheduled to be collected by November 15, 1996. Groundwater level measurements will also be completed by that date.

Routine waste management tasks were performed during September, including collecting, sampling, and accumulating investigation-derived waste (IDW) in tanks and bins, and inspecting bin locations and the decontamination pad.

Remedial Investigation Documents:

Parcel A: The Draft Parcel A Finding of Suitability to Transfer (FOST) was submitted to the agencies for review on June 24. Comments were received on July 24 and 25, 1996, from U.S. Environmental Protection Agency (EPA), Department of Toxic Substances Control (DTSC), and the City and County of San Francisco. Responses will be submitted in the Draft Final Parcel A FOST, now rescheduled for submittal in November 1996, pending completion of the letter of concurrence from the U.S. EPA concerning the completion of all the required environmental investigation along with a letter from the RWQCB that confirms the completion of the UST investigation and removal at UST S-812 in Parcel A.

Navy is currently investigating if a notification requirement for current storage of hazardous substances in some buildings at Parcel A, specifically those used by artisan tenants, is needed.

RI Reports: The Draft Final Parcel D RI Report was submitted on October 25. Progress is ongoing in the preparation of the Parcel C and E RI reports.

FS Reports: The Draft Final Parcel B Feasibility Study (FS) was submitted on September 3, 1996. Responses to any comments will be submitted to the agencies concurrent with the incorporation of the responses into the draft final report. The Parcel D Draft FS was submitted to the regulatory agencies on September 26, 1996, and the Navy is expecting comments on November 12, 1996. Progress is ongoing in the preparation of the Parcel C FS report.

Proposed Plan Reports: The Navy prepared the Parcel B proposed plan (PP) and submitted the plan to the regulatory agencies on September 3, 1996. Preparation of the PP for Parcel D has begun.

Record of Decision (ROD): The Navy began preparation of the draft ROD for Parcel B.

Removal Actions:

Exploratory Excavations: Exploratory excavation removal activities were initiated on August 8 and continued through October. As of the last week of October the RAC contractor had completed all but one exploratory excavation (EE-12), which requires shoring prior to excavation. A shoring design has been prepared and is currently under review. Daily field reports are being prepared by the contractor and submitted to the Navy for review.

IR-1/21 Industrial Landfill Groundwater Plume: The Navy prepared the Final Action Memorandum for IR-1/21 signed September 24, 1996 and sent out October 3, 1996. The final action memorandum reflects agency comments. Preliminary field testing of the area by cone penetrometer testing (CPT) and Hydropunch® groundwater sampling is currently underway to evaluate the soil and groundwater conditions along the alignment proposed for the sheet piling portion of the action.

IR-3 Waste Oil Ponds: The Navy reviewed responses to the comments received from the agencies and the community on the Draft Final Engineering Evaluation/Cost Analysis (EE/CA) and draft action memorandums for IR-3. The Final Action Memorandum was completed and submitted on October 1, 1996. The Final EE/CA was included as Attachment A.

Storm Drains: Work began during the week of September 23-27 and consisted of initial reconnaissance and setup for video surveying. The RAC contractor completed construction of the treatment plant necessary to perform phase separation of the removed storm drain sediments. Removal of sediments from the storm drain lines commenced on October 17, 1996 and will continue for approximately 3 months.

Tank Farm (IR-6): This work is being performed by Public Works and CH₂M Hill. The public comment period on the EE/CA for this removal action began on June 26, 1996. The Navy proposed to dig up metal and PCB contaminated soil from the tank farm for off-site disposal..

Dry Dock 4: This project has been folded into the Parcel C Remedial Investigation/ Feasibility Study phase. Since this is no longer a removal action, this item will be deleted from this section.

Ecological Risk Assessment Phase 1B:

The Draft Phase IB Ecological Risk Assessment Report has been divided into two Volumes: Volume I, Part 1 Nature and Extent of Contamination, Part 2 Characterization of Risk to Aquatic Receptors and Volume II, Chemistry and Toxicity Test Results. Volume I, Part 1 and Volume II were submitted September 30, 1996. Volume I, Part 2 is to be submitted on November 15, 1996. Writing of the Phase 1B report continued. Currently, toxicity reference values (TRV) are being discussed between the Navy and agencies at other Naval facilities; the resultant TRVs will be applied at HPS

Radiation Issues:

Submittal of the Draft Final Phase III Radiation Investigation Field Work Plan was delayed following regulatory agency requests for complete historical documentation to be included. The Navy submitted the final draft of the field work plan to the regulatory agencies on October 15, 1996. Additionally, the Navy submitted to the agencies a technical memorandum that addresses the tidal area surrounding IR-02 on June 28, 1996. Written comments have been received from the U.S. EPA, DTSC, and DHS and the Navy is currently reviewing responses.

Radiation-related field activities conducted during October included weekly inspections and maintenance of drums and bins containing potentially radioactive IDW. The remaining drums and bins of IDW from IR-01 and IR-02 will be chemically characterized and disposed of by a naval subcontractor in November or December 1996. A subcontractor completed surveying and sampling drums and bins of IDW in September. The screening was completed within two weeks, with analytical results expected to be reported in November. Following the IDW survey and authorization for release, the IDW will be transported off-site for disposal.

A water sample was collected from the subsurface secondary containment vault outside of Building 364 to confirm that no gamma-emitting radionuclides were above discharge criteria as a part of the Parcel D RI field investigation. Analytical results were inconclusive; therefore, seven

additional samples have been collected and analyzed for gross alpha and beta radioactivity along with gamma emitting radionuclides.

Community Relations:

The Draft Final Revised Community Relations Plan (CRP) was submitted to the regulatory agencies on June 11, 1996; comments were received from DTSC on July 3, 1996. The Navy agreed to respond to DTSC's comments in mid-October, 1996; however due to the need to update the roster of new Restoration Advisory Board (RAB), the response to DTSC's comments will be submitted in November.

2. MEETINGS AND REPORTS SUBMITTED

Meetings:

The BCT/remedial project manager (RPM) meeting was held on October 16, 1996.

A Restoration Advisory Board (RAB) meeting was held on October 23, 1996. The RAB meeting in October consisted of an informal discussion of the Parcel B Proposed Plan and a presentation by the San Francisco Redevelopment Agency on a proposed redevelopment for a waste paper recycling mill site at HPS.

Documents Submitted in October 1996:

- Draft Final Proposed Plan for Parcel B
- Draft Parcel B Record of Decision (ROD)
- Draft Final Parcel D Remedial Investigation (RI) Report
- Supplemental Site-Specific Environmental Baseline Survey (SSEBS) and Finding of Suitability to Lease (FOSL) for Building 606
- Response to Comments on the Draft Final Parcel B Feasibility Study

3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

Off-site Access for RI Work:

The Navy is currently evaluating the access issues involved in sampling off-site adjacent to IR-7 and 18 in Parcel B. As was stated in Parcel B RI and Proposed Plan the contamination seen on the Navy's property appears to be part of larger area occurring on the adjacent private property as well. To adequately determine the nature and extent of this contaminated area will require sampling on this private property. In previous attempts to sample in the area the Navy has been unable to obtain access. The Navy is investigating what legal options it may have available.

Petroleum-only Sites at HPS:

The Navy has started the identification of installation restoration sites within Parcels B through E that contain (1) petroleum-only constituents (non-CERCLA hazardous substances) in soils; (2) petroleum constituents with CERCLA substances in soils below screening levels; (3) CERCLA substances in soils above screening levels; and (4) sites that require no further action. The purpose is to segregate petroleum-only in soil and groundwater issues from CERCLA issues for administrative purposes, and inclusion of these sites in a petroleum corrective action plan (CAP). The preparation of these CAPs for all four parcels B, D, C, and E is expedited to begin in November, pending receipt of. This work is being performed by AFA Construction.

Scope of the Basewide RI Report:

The current Federal Facility Agreement (FFA) lists a deliverable for a Basewide RI Report to accompany the delivery of the Parcel E RI Report. The scope of the Basewide RI is not currently defined. Current discussions concerning the Basewide RI are focusing on a Basewide ROD to address ecological issues. The preparation of the draft Parcel E RI Report before the final reports from the ecological risk assessment may result in a data gap which could support the preparation of a Basewide RI/FS/ROD. The scope of a Basewide RI report and potential Basewide ROD are under discussion between the Navy and the BCT. The Navy submitted a proposed scope of work for the Basewide RI to the agencies on June 14, 1996. The Navy and BCT are still evaluating the need and or scope and submittal date for a Basewide RI.

Ecological Risk Assessment:

The current approach for the Phase 1B ecological risk assessment is to use those toxicity reference values (TRV) for avian receptors which have been agreed to by the regulatory agencies for use at other San Francisco Bay Navy installations. The goal of the approach is to provide assessments that use agreed-upon TRVs to establish a uniform Bay Area-wide approach. To facilitate the use of this approach, the BCT agreed to delay the submittal of the risk characterization portion of the Phase 1B Ecological Risk Assessment Report until November 15, 1996. As a result, Part 1 of Volume 1 and Volume 2 were submitted in September to allow the regulatory agencies to review them prior to the submission of Part 2 of Volume 1.

4. REPORTS AND ACTIVITIES FOR NOVEMBER 1996

Documents Scheduled for Submittal in November 1996:

- Draft Final Parcel A FOST
- Final Proposed Plan for Parcel B
- Draft Phase 1B Ecological Risk Assessment Volume 1, Part 2
- Draft Parcel C Remedial Investigation Report
- Final Revised Community Relations Plan

Activities Planned for November 1996:

- **Field Investigations:** Continue with the implementation of groundwater sampling at Parcel E, and finish the soil gas survey at SI-74 in Parcel E.
- **Removal Actions:** Continue work at IR 1/21 and IR-6. Continue the removals at the exploratory excavations initiated in August 1996. Continue field work on the storm drain removal action started in September 1996
- **Meetings:** Attend the BCT/RPM meeting scheduled for early- to mid-November 1996. Attend the Parcel B Proposed Plan / RAB meeting scheduled for November 13, 1996.
- **Radiation Issues:** Initiate the screening of Naval Radiation Defense Laboratory (NRDL) sites which was originally scheduled for September 1996. Continue the radiation-related waste management activities until Radiological Affairs Support Office's (RASO) contractor takes the IDW off-site. Continue the preparation of any response to comments if necessary for the Draft Final Phase III Radiation Investigation Field Work Plan.
- **RI/FS Reports:** Continue the preparation of the Parcels C and E RI reports.
- **Proposed Plan:** Continue the preparation of the Final Parcel B proposed plan after the close of the public comment period on November 25, 1996 and the public meeting to be held on November 13, 1996.
- **Draft Record of Decision (ROD) Document:** Continue preparation of the Parcel B ROD after receiving comments from the regulatory agencies on the draft ROD submitted on October 17, 1996.
- **BCT Activities:** Prepare for the monthly BCT/RPM meeting.

5. KEY PERSONNEL CHANGES

Anna Marie Cook, the U.S. EPA's RPM for Parcel B, will be leaving the HPS project team following the completion of the ROD on Parcel B. Claire Trombadore and Sheryl Lauth EPA/RPMs are returning to the project working on Parcels D and C respectively.

6. DELIVERABLES STATUS

This listing consists of installation deliverables organized by parcel, multiparcel (or facility wide), and removal actions, and their status. Please note that as deliverables are completed, they will no longer be included in subsequent progress reports.

Parcel A Reports

- Draft Final Parcel A Finding of Suitability to Transfer
Status: Scheduled for submittal to the agencies following receipt of letters of concurrence from the EPA and RWQCB regarding completion of necessary work.

Parcel B Reports

- Draft Final Parcel B Feasibility Study Report
Status: Submitted to the agencies on September 3, 1996. Agency review period is 30 days; still awaiting comments from the EPA.

Parcel C Reports

- Draft Parcel C RI Report
Status: Scheduled submittal to agencies on November 29, 1996. Agency review period is 45 days. Currently undergoing data interpretation and report preparation.
- Draft Parcel C Feasibility Study Report
Status: Scheduled submittal to the agencies on February 27, 1997. Agency review period is 45 days.

Parcel D Reports

- Draft Final Parcel D RI Report
Status: Submitted to the agencies on October 25, 1996. Agency review period is 30 days.
- Draft Parcel D Feasibility Study Report
Status: Submitted to the agencies on September 26, 1996. Agency review period is 45 days, comments due on November 12, 1996
- Draft Final Parcel D Feasibility Study Report
Status. Scheduled submittal to the agencies on December 26, 1996. Agency review period is 30 days.

Parcel E Reports

- Draft Radiation Investigation of the Tidal Area Surrounding the Bay Area Landfill (IR-02) Technical Memorandum
Status: The report was submitted to the agencies on June 20, 1996. The Navy is currently awaiting agency comments from U.S. EPA, and is preparing responses to comments to those received from DTSC and DHS.
- Draft Parcel E RI Report
Status: Scheduled submittal to agencies on April 29, 1997. Agency review period is 45 days. Currently performing quality control of the Parcel E database.

Parcel F Reports

- Draft Phase 1B Ecological Risk Assessment Report
Status: Submitted Volume 1 Part 1, and Volume 2 to agencies on September 30, 1996. Part 2 of Volume 1 is to be submitted to the agencies on November 15, 1996. Agency review period is 45 days and starts on November 15, 1996. The Draft Final report is submitted 45 days after receipt of agency comments.

Multiparcel/Facility-Wide Investigation Reports

- Draft Final Results of Subsurface Radiation Investigation on Parcels B and E
Status: The report was submitted to the agencies in mid July. Waiting on comments from the agencies.
- Draft Final Phase III Radiation Investigation Field Work Plan
Status: Submittal to the regulatory agencies on October 15, 1996. Discussion between the Navy and agencies will be necessary to finalize specific agency response to comments.
- Draft Annual OU II Groundwater Monitoring Report
Status: Submitted to the agencies in June 1996.
- Draft Final Revised Community Relations Plan
Status: To be delivered to the agencies in November, 1996.
- Final Basewide Environmental Baseline Survey
Status: Submitted to the agencies on June 3, 1996; no comments are expected from the agencies.
- Draft Study of Groundwater Sampling Methods for Metals Technical Memorandum
Status: Distributed to the agencies in May and currently awaiting comments.
- Draft Review of PCB Occurrences in Soil and Groundwater Technical Memorandum
Status: Submitted to the agencies on June 26, 1996.

Removal Actions

- Draft Construction Summary Report of Pickling and Plate Yard Removal Action
Status: The draft report was submitted to the agencies on August 2, 1996. Agency comments were received on October 23, 1996.
- Draft Construction Summary Report of Exploratory Excavations
Status: To be prepared following completion of removal action
- Draft Construction Summary Report of IR-1/21 Groundwater Removal Action
Status: To be prepared following completion of removal action

- Draft Construction Summary Report of IR-3 Floating Product Removal Action
Status: To be prepared following completion of removal action
- Draft Construction Summary Report of Storm Drain Sediment Removal Action
Status: To be prepared following completion of removal action



RICHARD POWELL
LEAD REMEDIAL PROJECT MANAGER

11-19-96

DATE